

Order Instituting Rulemaking for Electric Distribution Facility Standard Setting.

Dated: July 1, 2003

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking for Electric)
Distribution Facility Standard Setting.)

R.96-11-004
(Filed November 8, 1996)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL
REPORT OF 2002 ACTIVITIES FILED PURSUANT TO
GENERAL ORDER NO. 165**

Pursuant to General Order No. 165 (G.O. 165) and Decision No. 97-03-070 issued by the California Public Utilities Commission (Commission or CPUC), and to Rule 32 of the Commission's Rules of Practice and Procedure (Title 20, *Cal. Code Reg's* § 32), Southern California Edison Company (SCE) hereby files its 2002 Annual Compliance Report describing our compliance activities completed in 2002 and compliance activities planned for 2003.

I.

INTRODUCTION AND SUMMARY

In 2002, SCE completed 4,136 circuit patrols, 340,250 detailed and intrusive inspections, and 28,003 corrective actions on facilities subject to G.O. 165. This report includes two attachments incorporated herein by this reference: Attachment A is a table containing summary data of SCE's compliance activities for 2002

presented on a system wide basis. Attachment B contains a series of tables providing a detailed presentation of SCE's 2002 compliance activities, by equipment type, with district-by-district breakdowns.

II.

BACKGROUND

California Public Utilities Code Section 364¹ requires the Commission to adopt standards for the inspection, maintenance, repair, and replacement of electric utility distribution facilities. Subdivision (b) of that section provides that, in setting standards for maintenance, repair, and replacement, the Commission shall consider cost, local geography and weather, applicable codes, national electric industry practices, sound engineering judgment, and experience.

In Decision No. 97-03-070, effective March 31, 1997, the Commission adopted G.O. 165, which established minimum inspection requirements for certain electric distribution facilities (including maximum allowable inspection cycle lengths), condition rating, and record keeping and reporting on scheduling and performance of corrective action. G.O. 165 imposed the following reporting requirements:

Each utility shall submit to the Commission an annual report detailing its compliance with the general order. These reports will include the utility's plans for the types of inspections and equipment to be inspected during the coming year. The report shall identify the number of facilities, by type, which have been inspected during the previous period. It shall identify those facilities which were scheduled for inspection but which were not inspected according to schedule and shall explain why the inspections were not conducted, and a date certain by which the required inspection will occur. The report shall also present the total and percentage breakdown of equipment rated at each condition rating level, including

¹ All code references are to the California Public Utilities Code unless otherwise noted.

that equipment determined to be in need of corrective action. Where corrective action was scheduled during the reporting period, the report will present the total and percentage of equipment which was and was not corrected during the reporting period. For the latter, an explanation will be provided, including a date certain by which required corrective action will occur. The report will also present totals and the percentage of equipment in need of corrective action, but with a schedule date beyond the reporting period, classified by the amount of time remaining before the scheduled action. All of the above required information shall be presented for each type of identified facility and shall be aggregated by district.²

III.

SUMMARY OF SCE'S INSPECTIONS AND CORRECTIVE ACTION ACTIVITIES DURING CALENDAR YEAR 2002

G.O. 165 requires annual inspection performance data, condition ratings, and corrective action information. The following is a narrative summary of the required data. In addition, Attachment A contains a tabular summary of data and Attachment B provides a detailed breakdown of data for each distribution work location.

A. Patrols

As defined in G.O. 165, a patrol is a simple visual inspection, of applicable utility equipment and structures that is designed to identify obvious structural problems and hazards. Patrols may be carried out in the course of other company business.

² G.O. 165, Section IV.

1. Circuit Patrols (Urban and Rural)

G.O. 165 requires annual patrols of all urban circuits and biennial patrols of all rural circuits. In 2002, SCE completed 4,136, or 106% of the planned number of circuit patrols, including all 3,909 of the specific circuits due for inspection in 2002.

2. Streetlight Patrols (Urban and Rural)

G.O. 165 requires annual patrols of all urban streetlights, and biennial patrols of all rural streetlights. In the 2001 Annual Report, SCE reported that in 2002 it planned to patrol 100% of both our urban and rural streetlight inventory (a total then of 573,891 streetlights). In 2002, SCE patrolled 100% of its urban streetlight inventory and its entire rural streetlight inventory except the streetlights in the 29 Palms work location. Streetlights in the 29 Palms work location were not patrolled because it was determined that these streetlights were patrolled in early 2001, thus eliminating the requirement for a 2002 patrol. The increase in the year-end streetlight inventory (from 573,891 to 583,685) is due to new construction during the course of the year.

B. Intrusive and Detailed Inspections

1. Generally

In the 2001 Annual Report, SCE reported that it planned to complete 469 overhead detailed circuit inspections, 65,797 underground and pad-mounted equipment detailed inspections and 80,000 wood pole intrusive inspections in 2002. SCE actually completed 749 overhead detailed inspections, 71,041 underground and pad-mounted equipment detailed inspections and 139,191 wood pole intrusive inspections in 2002. This

represents 160% of the planned overhead detailed inspections, 108% of the planned underground and pad mounted equipment detailed inspections and 174% of the planned wood pole intrusive inspections. In total, SCE completed 148% of the detailed inspections it planned to perform in 2002 (229,087 planned vs. 339,501 performed). As required by G.O. 165 for specific types of equipment, SCE assigned condition ratings based on those detailed and intrusive inspections, as discussed in Section C, below.

2. Intrusive Inspections

In the 2001 Annual Report, SCE reported its plan to complete a total of 80,000 intrusive inspections of wood poles in 2002. During 2002, SCE completed a total of 139,191 intrusive inspections. Although SCE completed 174% of the planned inspections, there is a remaining balance of 16 poles that were not inspected as planned. The reason for the small remaining balance is that the specific locations of some of the wood poles intrusively inspected were changed in order to coordinate with other activities. Safety, reliability, maintenance and new business activities may include wood pole intrusive inspection to insure structural integrity before work is performed. The planned intrusive program is adjusted in conjunction with these activities wherever they occur throughout the service territory during the course of the year. Intrusive inspections originally planned as part of the G.O. 165 compliance program for some areas are replaced by the intrusive inspections performed in support of safety, reliability, maintenance and new business activities in other areas. As a result, some work locations planned to be covered were not inspected, as reflected in the balance shown in Table A, while other areas were inspected even though they were not part of the 2002 plan. Overall, our G.O. 165 compliance plan is on track to have all poles

older than 15 years (as of 1997) receive their first intrusive inspection by March 1, 2007. In accordance with this plan, SCE plans to complete intrusive inspection of 95,000 poles in 2003.

3. Overhead Detailed Inspections

In the 2001 Annual Report, SCE reported its plan to complete 469 detailed inspections in 2002. In fact, SCE completed 749 detailed inspections, or 160% of the 2002 planned inspections. In addition, SCE completed all planned detail inspections of its overhead transformers, switching/protective devices, regulators, capacitors, conductors, and cables. The 2001 Annual Report identified 83,290 such pieces of overhead equipment in which SCE planned to perform detailed inspections, and SCE actually completed 129,269, or 155%, of these inspections.

4. Underground and Pad Mounted Equipment Detailed Inspections

In 2002, SCE completed all of its planned underground and pad mounted equipment detailed inspections. In the 2001 Annual Report, SCE reported its plan to complete 65,797 underground and pad mounted equipment detailed inspections in 2002. SCE actually completed 71,041 underground and pad mounted equipment detailed inspections, or 108% of the planned inspections.

C. Condition Ratings

G.O. 165 requires SCE to rate the condition of specified equipment during inspection (transformers, switches, regulators, capacitors and conductors). Under SCE's condition rating system, established in 2001, condition rated 1 equipment and structure repairs are made immediately. SCE plans ahead for condition rated

2, 3 & 4 repairs. Condition rating 5 is used for all equipment whose condition either does not require any repair or does not require any scheduled repair. To the extent condition rated 5 equipment needs repair, those repairs are completed on equipment and structures in conjunction with planned ahead work for condition rated 2, 3, and 4 repairs.³ SCE's 2002 inspections resulted in findings of 6,266 facilities with Level 2 condition ratings, 25,640 facilities with Level 3 condition ratings and 83,476 facilities with Level 4 condition ratings. The remaining 2,153,836 facilities subject to condition rating were rated at Level 5.

D. 2002 Planned Corrective Actions

In the 2001 Annual Report, SCE outlined its plan to complete corrective actions on 6,020 facilities with Level 2 condition ratings, 6,052 facilities with Level 3 condition ratings, and 4,557 facilities with Level 4 condition ratings, for a total of 16,629 planned corrective actions during 2002. SCE completed corrective actions on 11,549 facilities with Level 2 condition ratings, 6,559 facilities with Level 3 condition ratings and on 8,511 facilities with Level 4 condition ratings, for a total of 26,619 completed corrective actions in 2002. SCE completed 9,990 more corrective actions than planned for 2002, and 14,656 more corrective actions than completed in 2001.

These totals include (a) corrective actions due for completion in 2001 but reported in the 2001 Annual Report as uncompleted and scheduled for completion in 2002 (see Section III.D of SCE's 2001 Annual Report filed July 1, 2002⁴),

³ SCE's condition ratings 2-4 are similar to its corrective action priorities. Condition rating 5 includes equipment that either does not require any scheduled corrective action or does not require any corrective action at all. Condition rated 5 items are repaired when planned work (condition rated 2-4) is performed at or above the work level containing these items, and the crew is qualified and equipped to complete the work.

⁴ All of the outstanding 2001 corrective actions reported in the 2001 Annual Report as being incomplete as of that recording date (7/1/02) have been completed, with the exception of one wood

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(b) corrective actions planned for completion in 2002 based on prior years' inspections, (c) corrective actions that were identified during inspections conducted in 2002 and due for completion in 2002, (d) corrective actions that were identified during inspections conducted in 2002 that were due for completion in subsequent years and were completed ahead of schedule, and (e) corrective actions that were in the pending maintenance log of previous findings and due for completion in subsequent years which were actually completed ahead of schedule.

While the total number of corrective actions completed by SCE in 2002 greatly exceeds the plan in aggregate, SCE did not complete all of the scheduled corrective actions. As reflected in Table A, page 3, there was a balance of 1,860 planned corrective actions that were not completed as of the end of 2002. With the exception of 65 wood poles, all of these corrective actions have been completed as of the filing of this report. Of these remaining 65 poles, 49 are awaiting environmental clearance, 6 are awaiting permits, and the remainder have been delayed by other special circumstances. All of these remaining corrective actions are expected to be completed by the end of 2003. In addition, SCE plans to complete 25,881 corrective actions in 2003, which is 156% higher than the number of corrective actions

Continued from the previous page

pole, which is awaiting environmental clearance. This corrective action is expected to be completed by the end of 2003.

planned in 2002. The increase in corrective actions is directly related to the inspection findings from the detailed and intrusive inspection programs.

Respectfully submitted,

JAMES M. LEHRER

By: James M. Lehrer

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July 1, 2003

VERIFICATION

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this **1st day of July, 2003**, at Rosemead, California.

A.L. Grant
Vice President, Power Delivery
SOUTHERN CALIFORNIA EDISON COMPANY

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL REPORT OF 2002 ACTIVITIES FILED PURSUANT TO GENERAL ORDER NO. 165 on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

- ☐ Placing the copies in properly addressed sealed envelopes and depositing such envelopes in the United States mail with first-class postage prepaid (Via First Class Mail):
 - ☐ To all parties, or
 - ☐ To those parties without e-mail addresses or whose e-mails are returned as undeliverable;
- ☐ Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Commission or the other addressee(s);
- ☐ Transmitting the copies via e-mail to all parties who have provided an address.

Executed this **1st day of July, 2003**, at Rosemead, California.

Meraj Rizvi
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

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ATTACHMENT A

ATTACHMENT B



SOUTHERN CALIFORNIA
EDISON

An EDISON INTERNATIONAL Company

James M. Lehrer
Senior Attorney
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July 1, 2003

Docket Clerk
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

RE: R.96-11-004

Dear Docket Clerk:

Enclosed for filing with the Commission are the original and five copies of the **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL REPORT OF 2002 ACTIVITIES FILED PURSUANT TO GENERAL ORDER NO. 165** in the above-referenced proceeding.

We request that a copy of this document be file-stamped and returned for our records. A self-addressed, stamped envelope is enclosed for your convenience.

Your courtesy in this matter is appreciated.

Very truly yours,

James M. Lehrer

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Enclosures

cc: All Parties of Record
(U 338-E)

